

This application requests a channel change to 89.9, channel 210, with a site change back to the site of our original application.

To justify the change, we look at “interference” in several ways:

1: “Interference” as seen on Longley Rice maps.

As shown on the following pages, co-channel fringe interference is reduced by changing channels.

The old channel 231 is surrounded by very close small stations, an LPFM and a translator, that will have a strong signal in the area where KXPE-LP has fringe coverage. Both are now construction permits, not built yet. The translator K231CZ is proposing a directional antenna with a deeper than usual null of 23-26 db in our direction, and steep slopes, leading to question of whether this performance can actually be achieved.

The proposed channel 210 has no nearby co-channel stations. There are only large stations sufficiently far away that any trace of signal they have is also very weak.

In this sense, KXPE-LP benefits, in the sense of reduced interference, from the channel change.

2: 73.807 spacing rules, and room to move.

As shown on the last two pages, because of a move by co-channel translator K231CZ, the allocation on channel 231 for KXPE-LP no longer meets 73.807 spacing requirements, designed to minimize interference, so would not be allocated today. To not move means that KXPE-LP would be grandfathered, but restricted in possible future moves.

The proposed channel 210 meets 73.807 spacing requirements, except for second and third adjacent stations for which waivers are routinely granted. Since other stations are farther away, there is significant room to move on this new channel.

This extra room to move will allow KXPE-LP to move back to the site used for the original application in 2013, which we left only to escape an MX group.

As shown herein, KXPE-LP benefits in many ways, including reduced interference, by the channel change.

Also, the proposed channel 210 is reserved for non-commercial use, so it is not available for an AM translator to move to. There are no losers if the channel change is granted.

Color code used on the maps following:

Longley Rice:

gray = 40-50 dbu

blue = 50-60 dbu

red = 60-70 dbu

FCC:

blue = 40 dbu

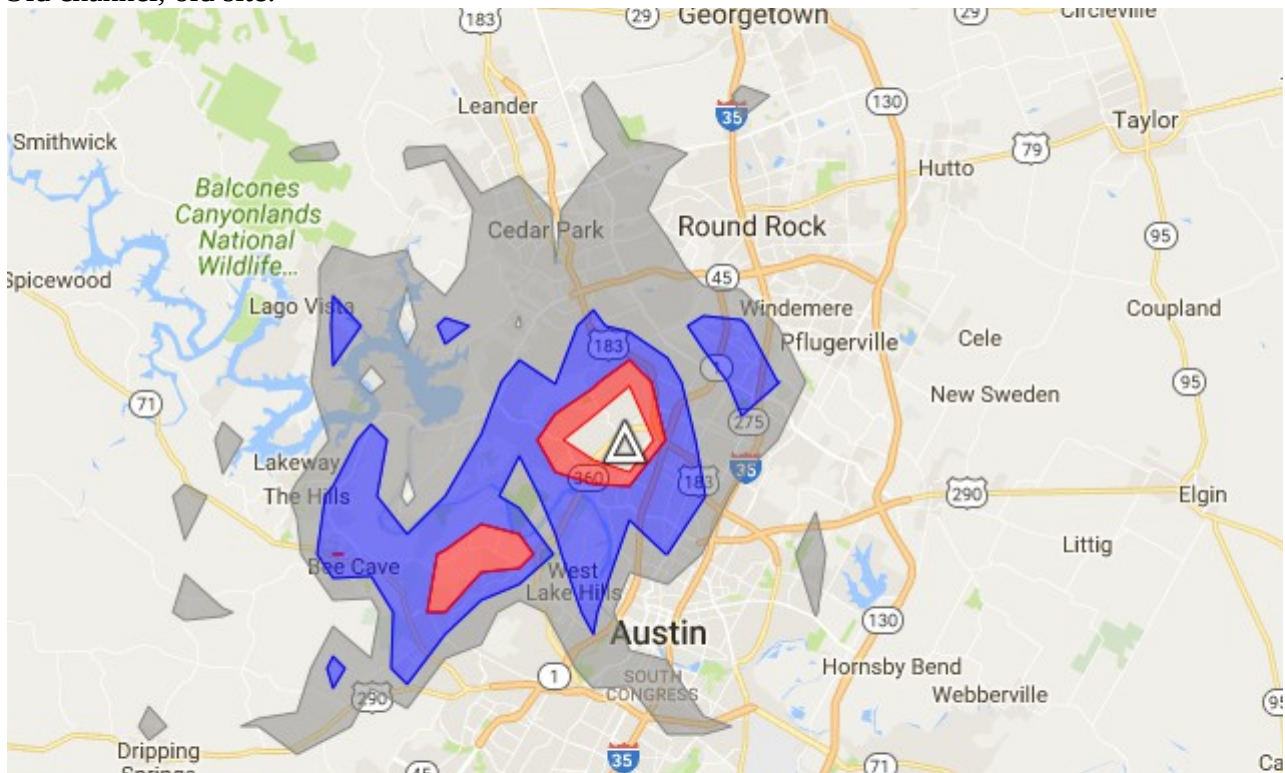
green = 54 dbu

red = 60 dbu

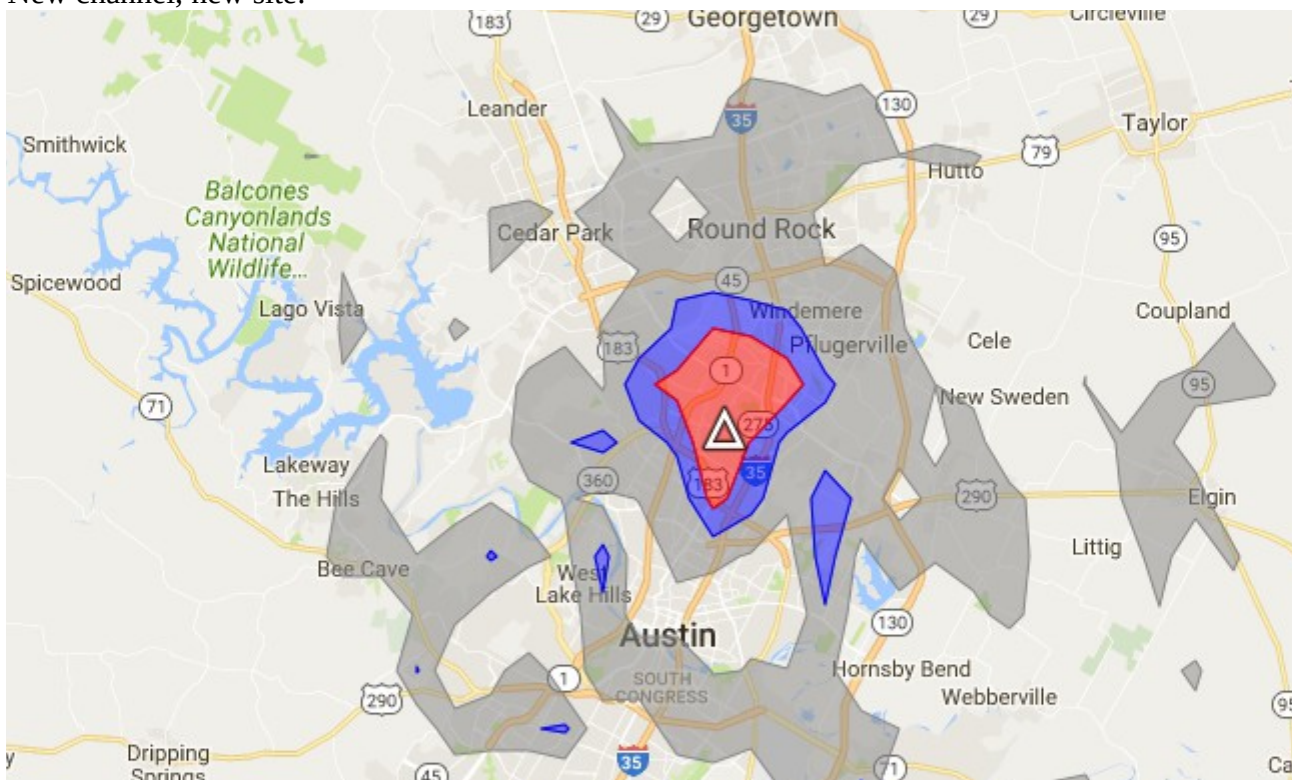
1: Comparing interference with Longley-Rice maps.

As a reference, this page shows the coverage, before and after, by Longley-Rice.

Old channel, old site:



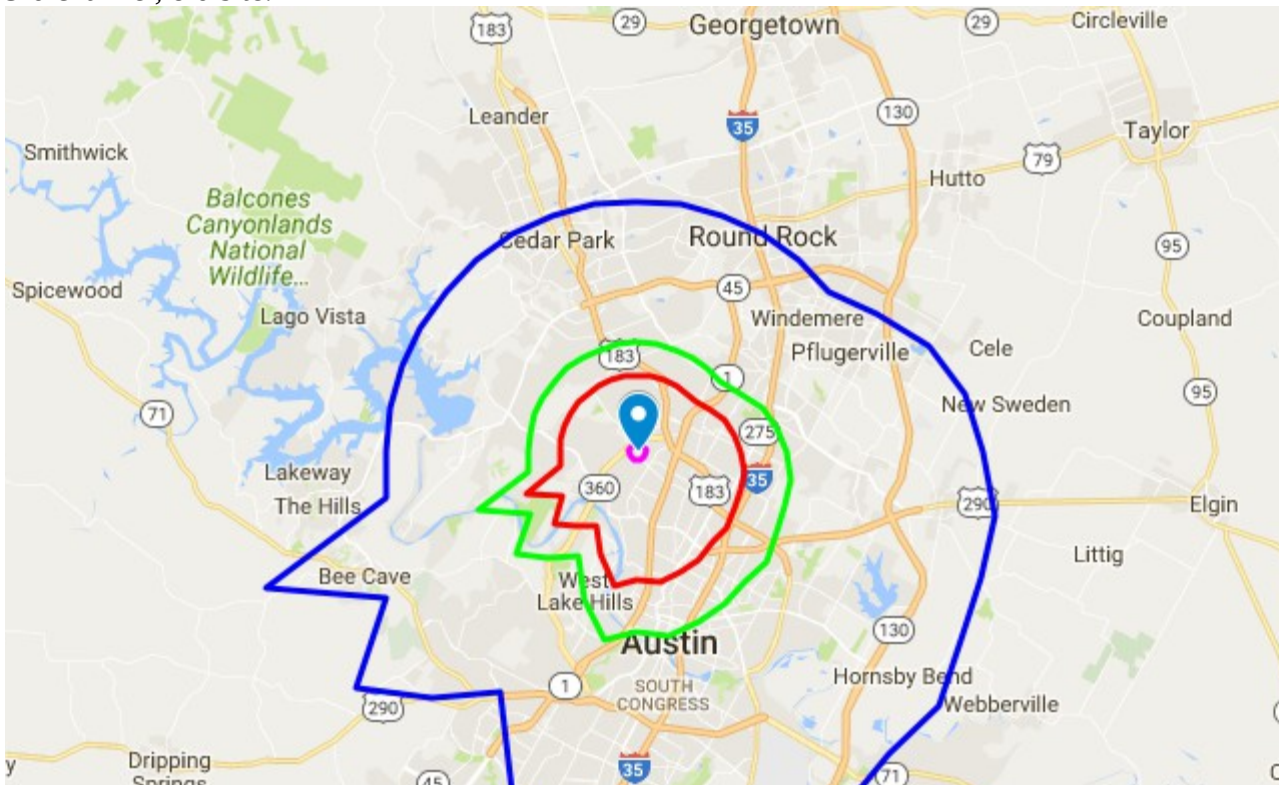
New channel, new site:



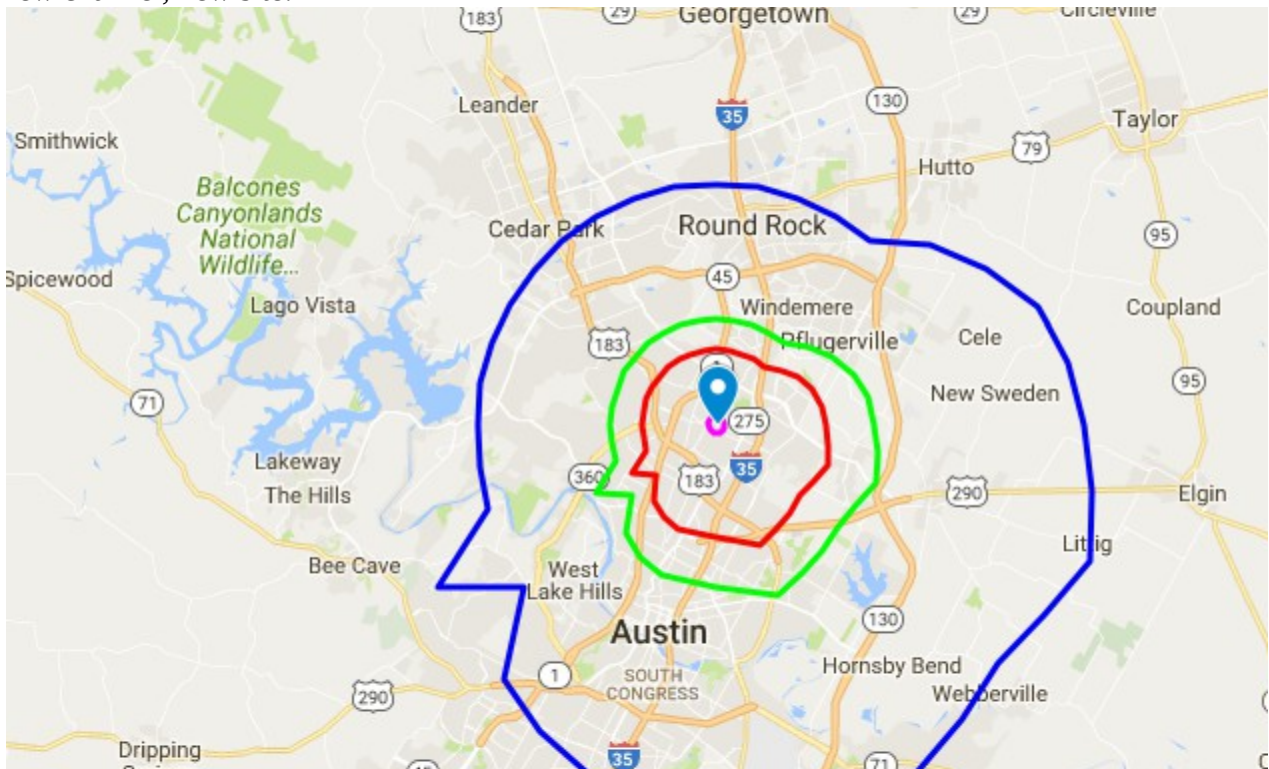
The “new site” is really the original site, in North Austin, the neighborhood we want to serve.

This page shows the coverage before and after as FCC contours.

Old channel, old site:

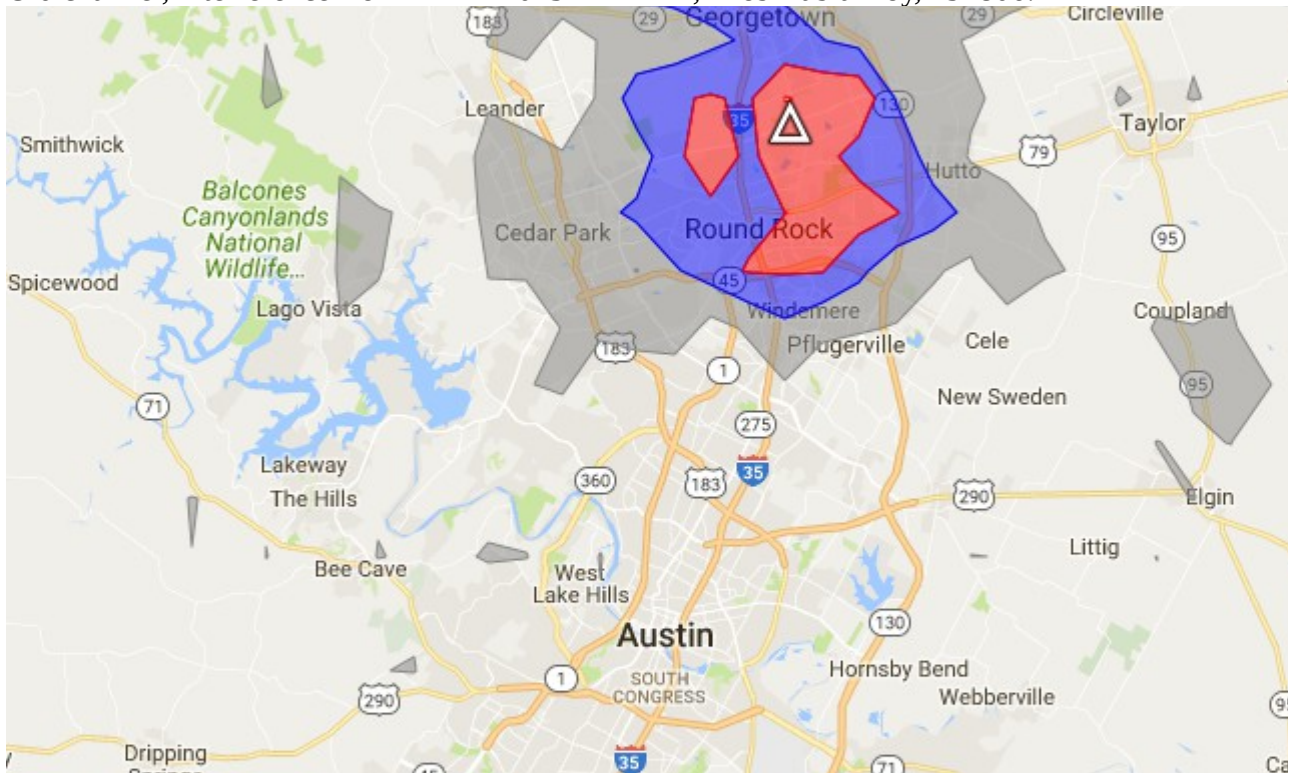


New channel, new site:

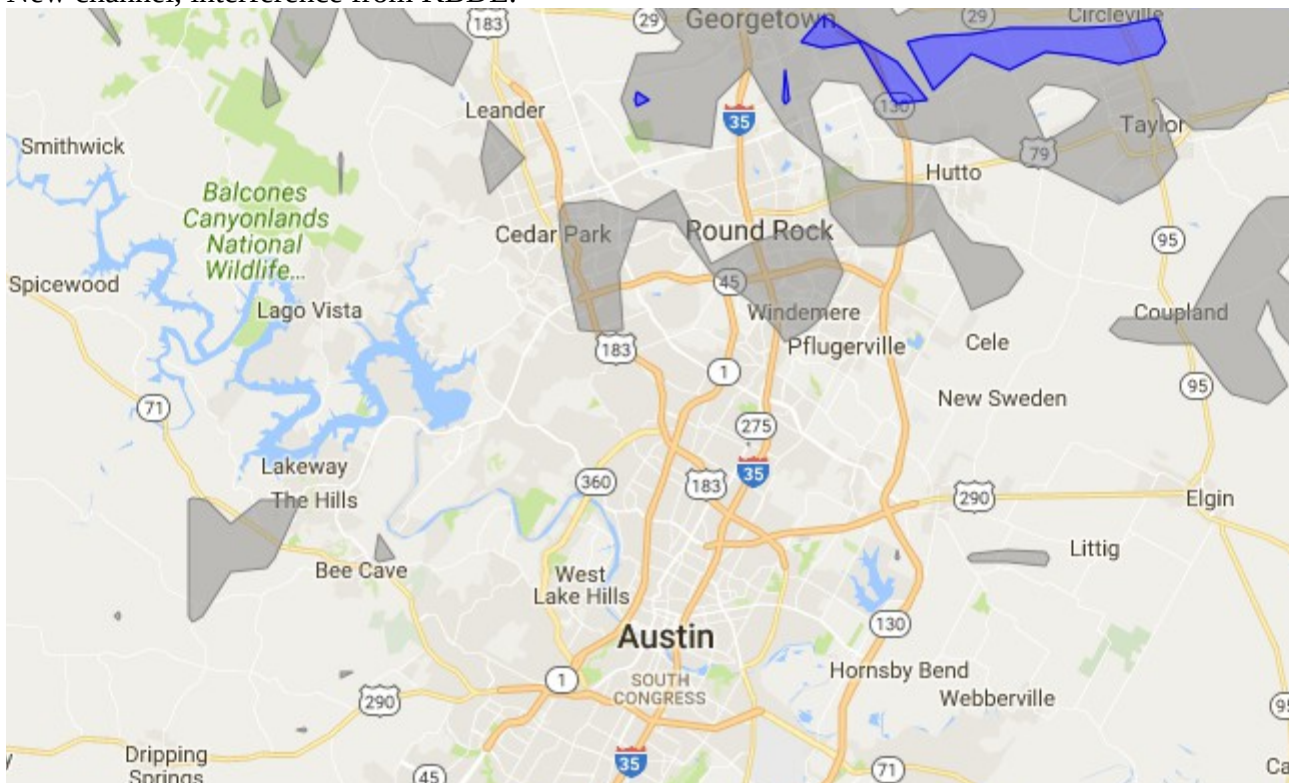


This page compares interference in the northern fringe:

Old channel, interference from BNPL-20131114ADE, Dios Habla Hoy, 194806:



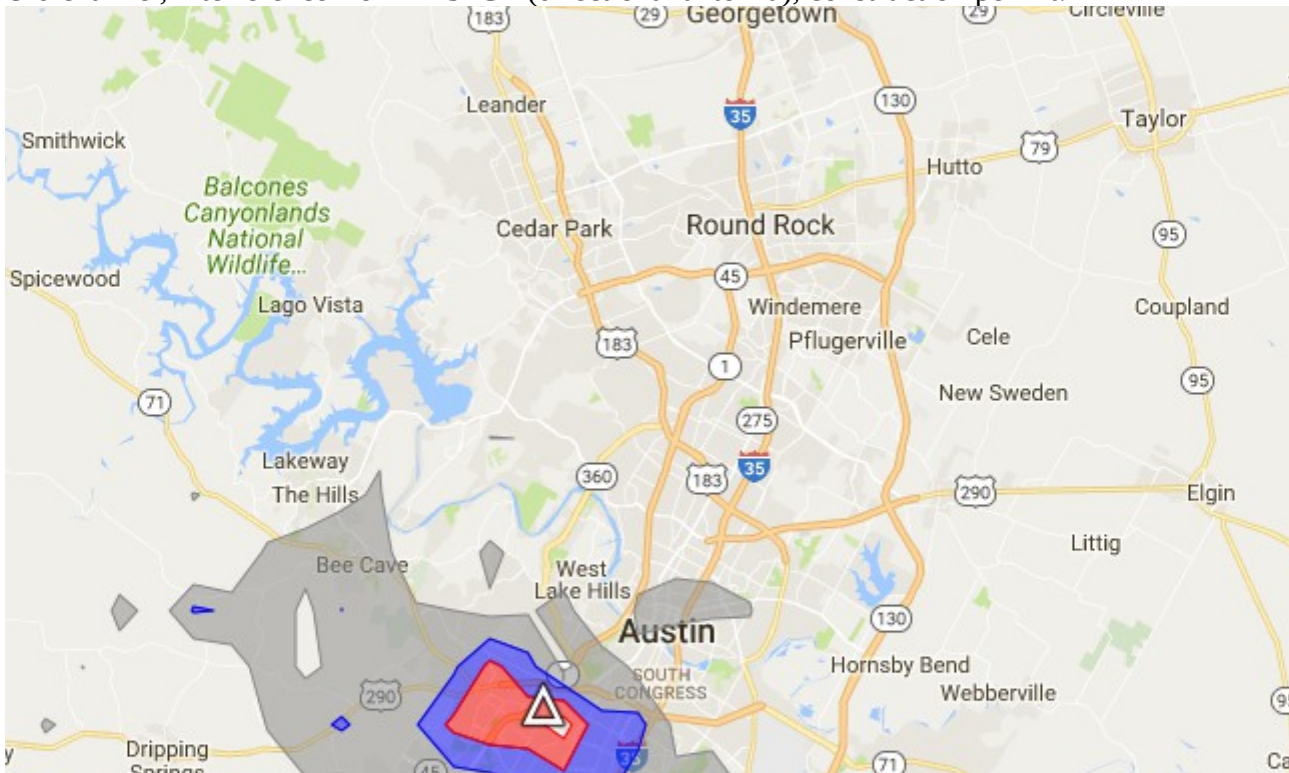
New channel, interference from KBDE:



These maps show that the new channel receives less co-channel interference in the northern fringe than the old channel. The LPFM 194806 will have a strong signal in North Austin, the primary area we want to serve. After changing channels, signal from KBDE is practically nonexistent there.

This page compares the southern fringe:

Old channel, interference from K231CZ (directional antenna), construction permit:



New channel, interference from KTSW:



These maps show that the new channel receives less co-channel interference in the southern fringe than the old channel.

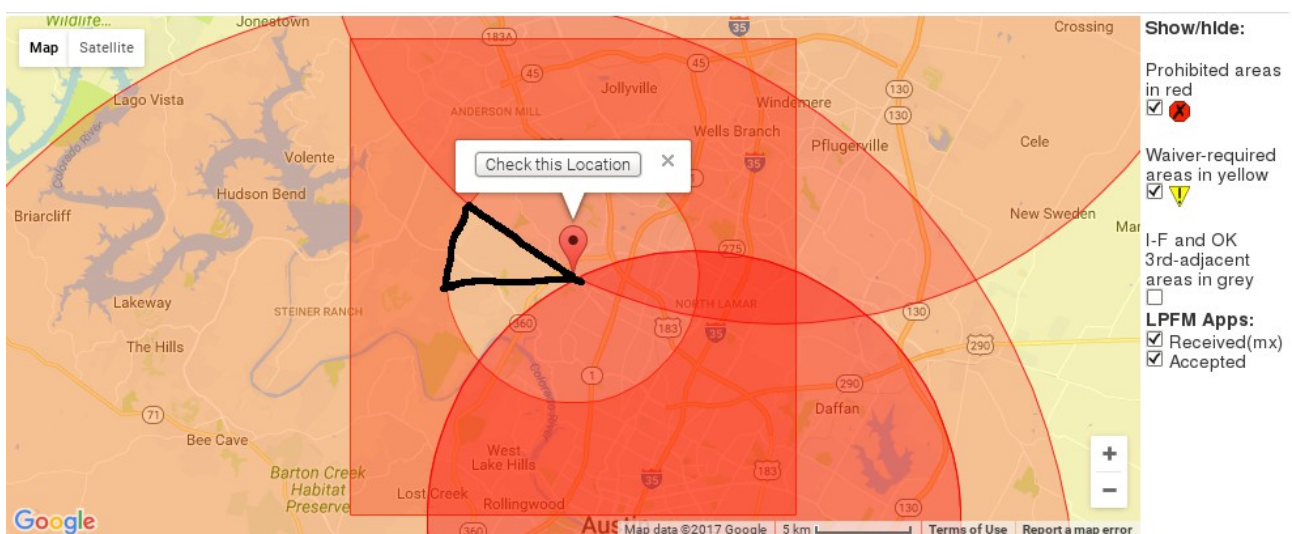
2: 73.807 distance rules, and room to move.

The existing channel and location is short-spaced to co-channel K231CZ by 73.807, which would be dismissed if it were filed today. The distance is 18.3 km. The required distance is 51 km. It is short spaced by 13.7 km. If this situation existed on the original application, it would have been dismissed without opportunity to amend.

It is also short-spaced to second-adjacent KLBJ-FM, but a waiver has been granted for this.

LPFM Channel Report - channel 231

	Ch.	MHz	Call	City of License	Class	Status	Distance	Minimum Required	Fully Spaced	Margin	Bearing
<input checked="" type="checkbox"/>	229	93.7	KLBJ-FM	AUSTIN TX US	C	LIC	8.1	93.0	93	-84.9	198.4
2nd	EMMIS AUSTIN RADIO BROADCASTING COMPANY, L.P. (FacID: 65792)										
<input type="checkbox"/>	231	94.1	KLTR	HEMPSTEAD TX US	C2	CP	136.3	91.0	143	45.3	93.7
CoCh	ROY E. HENDERSON One Step Application (FacID: 40775)										
<input checked="" type="checkbox"/>	231	94.1	KXPE-LP	AUSTIN TX US	L1	CP	0.0	24.0	24	-24.0	274.6
CoCh	NORTH AUSTIN COMMUNITY MEDIA (FacID: 192480)										
<input checked="" type="checkbox"/>	231	94.1	NEW	ROUND ROCK TX US	L1	CP	23.5	24.0	24	-0.5	26.1
CoCh	DIOS ABLA HOY (FacID: 194806)										
<input type="checkbox"/>	231	94.1	KWVH-LP	WIMBERLEY TX US	L1	LIC	56.8	24.0	24	32.8	213.7
CoCh	WIMBERLEY VALLEY RADIO (FacID: 192509)										
<input checked="" type="checkbox"/>	231	94.1	K231CZ	ENCINAL TX US	D4	CP MOD	18.3	32.0	51	-13.7	198.8
CoCh	WENDOLYNN TELLEZ (FacID: 148525)										
<input type="checkbox"/>	231	94.1	KTFM	FLORESVILLE TX US	C2	LIC	151.0	91.0	143	60.0	208.6
CoCh	ALPHA MEDIA LICENSEE LLC (FacID: 2543)										
<input type="checkbox"/>	231	94.1	KLTR	HEMPSTEAD TX US	C3	LIC	132.4	78.0	119	54.4	101.2
CoCh	ROY E. HENDERSON (FacID: 40775)										
<input checked="" type="checkbox"/>	232	94.3	KBPH-LP	AUSTIN TX US	L1	CP	13.7	14.0	14	-0.3	153.3
1st	AUSTIN CATHEDRAL, INC. (FacID: 192846)										
<input checked="" type="checkbox"/>	232	94.3	KCDR-LP	AUSTIN TX US	L1	CP MOD	13.7	14.0	14	-0.3	153.3
1st	CAMINO DEL REY (FacID: 194285)										
<input type="checkbox"/>	234	94.7	KAMX	LULING TX US	C0	LIC	7.1	0.0	0	7.1	207.0
3rd	ENTERCOM LICENSE, LLC (FacID: 48651)										
Channel does not satisfy third-adjacent spacing under Section 7 of the LCRA. Channel is still available but additional remediation policies may apply. In addition, existing LPFM stations that are causing interference to this station may move to a transmitter site within 500 meters of this station, even if it is more than 5.6km away. Run channel 231 report from this station's location.											



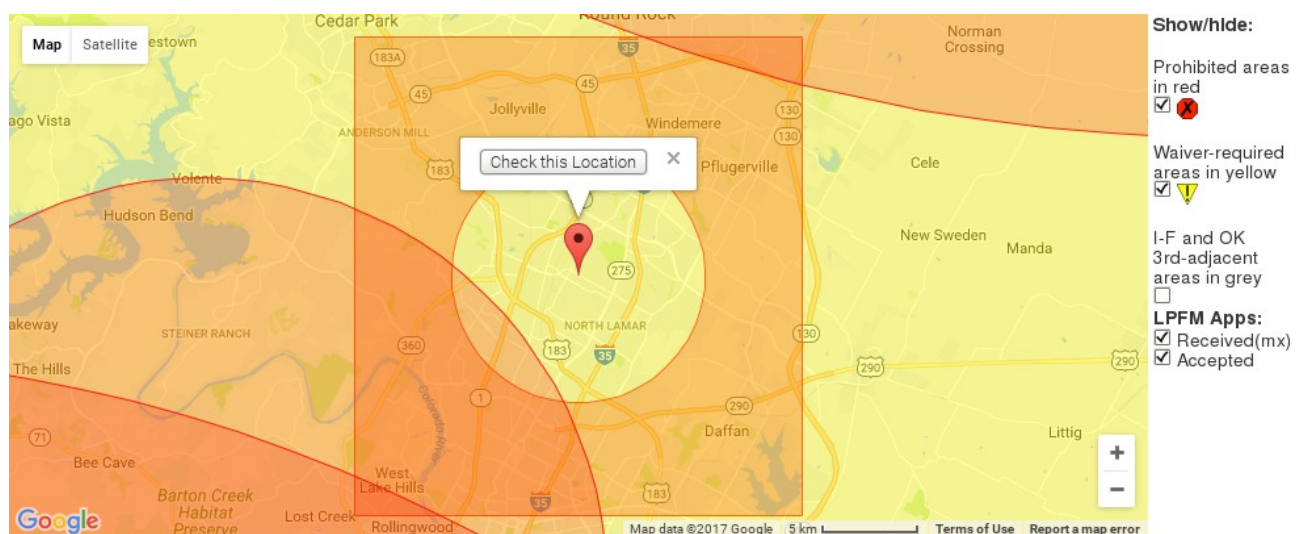
FCC policy is that in cases like this, an LPFM can change sites only if the distance is not made worse, limiting possible moves on the same channel to the black triangle. The only moves possible are farther from the organization's home neighborhood. This is counter to the hyper-local goals of LPFM.

The new channel at meets all co-channel and first-adjacent spacing requirements per 73.807 with a move back to the site used on the original application, the site vacated to settle an MX group. This move would enable us to cover the area originally intended, from the site originally intended. In this sense, “interference” is reduced.

The new channel and site is short-spaced to second-adjacent KMFA, for which waivers are routinely granted, and being requested.

It is also short spaced to third-adjacent KUT, which ordinarily would not be a factor at all, but in the past it has operated a radio reading service, so the second-adjacent rules apply. A waiver is being requested here.

LPFM Channel Report - channel 210											
	Ch.	MHz	Call	City of License	Class	Status	Distance	Minimum Required	Fully Spaced	Margin	Bearing
<input checked="" type="checkbox"/>	208	89.5	KMFA	AUSTIN TX US	C1	LIC	11.8	73.0	73	-61.2	230.9
2nd	CAPITOL BROADCASTING ASSOCIATION, INC (FacID: 8685)										
<input type="checkbox"/>	209	89.7	KUBJ	BRENHAM TX US	C2	LIC	121.0	80.0	84	41.0	107.6
1st	KSBJ EDUCATIONAL FOUNDATION (FacID: 85796)										
<input type="checkbox"/>	210	89.9	KBDE	TEMPLE TX US	C2	LIC	102.8	91.0	143	11.8	18.5
CoCh	AMERICAN FAMILY ASSOCIATION (FacID: 85761)										
<input type="checkbox"/>	210	89.9	KLGS	COLLEGE STATION TX US	C3	LIC	122.5	78.0	119	44.5	85.2
CoCh	AMERICAN FAMILY ASSOCIATION (FacID: 88084)										
<input type="checkbox"/>	210	89.9	KTSW	SAN MARCOS TX US	C3	LIC	91.3	78.0	119	13.3	206.8
CoCh	TEXAS STATE UNIVERSITY-SAN MARCOS (FacID: 61553)										
<input checked="" type="checkbox"/>	210	89.9	KXPE-LP	AUSTIN TX US	L1	APP	0.0	24.0	24	-24.0	269.9
CoCh	NORTH AUSTIN COMMUNITY MEDIA (FacID: 192480)										
<input type="checkbox"/>	211	90.1	K211FZ	AUSTIN TX US	D5	LIC	24.6	21.0	26	3.6	230.4
1st	CALVARY CHAPEL OF TWIN FALLS, INC. (FacID: 92021)										
<input checked="" type="checkbox"/>	213	90.5	KUT	AUSTIN TX US	C1	LIC	17.7	73.0	73	-55.3	241.6
3rd	THE UNIVERSITY OF TEXAS AT AUSTIN Radio Reading Service - Eligible for protection by LPFM on third adjacent channels. (FacID: 66573)										
	Channel does not satisfy third-adjacent spacing under Section 7 of the LCRA. Channel is still available but additional remediation policies may apply. In addition, existing LPFM stations that are causing interference to this station may move to a transmitter site within 500 meters of this station, even if it is more than 5.6km away.										
	Run channel 210 report from this station's location.										



This map shows that there is significant room to move on the new channel, without causing interference to any other stations.